

CD WELLBEING APP PRIVACY NOTICE

CelcomDigi Berhad (Reg. No. 199701009694 (425190-X)) (hereinafter referred to as “**CelcomDigi**”) and its subsidiaries (collectively referred to “**the Group**”, “**us**” or “**we**”) is committed to protecting and respecting your privacy.

This CD Wellbeing Privacy Notice (“**Privacy Notice**”) explains how we collect, use, process and store your Personal Data when you use the CD Wellbeing App (“App” or “Service”). Please read it carefully to understand our practices regarding your Personal Data and how we will treat it.

This Privacy Notice was last updated on **1 Sept 2023**.

1. Collection of Personal Data

1.1 The Group may collect Personal Data from a number of sources, including directly from you, as well as health and wellness applications and trackers (such as Google Fit and Apple Health Kit).

1.2 The Group may collect, store, use and process certain individually identifiable data about you as an App user (“**Personal Data**”) during the course of your App usage to the extent permitted by applicable law, including but not limited to your:

- (i) **Account information:** Including but not limited to name, age group, gender, and email address.
- (ii) **Health-related information:** Including but not limited to height, weight, blood type, and mental health evaluation.
- (iii) **Usage information:** Including but not limited to estimation of the number of steps you take, your distance travelled, and calories burned.
- (iv) **Geolocation information:** Including but not limited to GPS signals, device sensors, Wi-Fi access points, and mobile mast IDs.
- (v) **Device-related information:** Including but not limited to information required to provide access to the App, such as IP addresses, log files, login information, and operating system.

1.3 The Group will not collect, use, or process any Personal Data that is prohibited by applicable law.

1.4 Additionally, the Group in accordance with applicable law, may also collect limited “**Sensitive Personal Data**” that includes but not limited to:

- (i) Physical and/or medical health records (to provide our Services, e.g., providing a dashboard to track your exercise and activity).

1.5 Unless otherwise expressly stated, Personal Data would for purposes of this Privacy Notice include reference to Sensitive Personal Data.

2. Processing of Personal Data

2.1 The Group stores and processes your Personal Data for the following purposes:

- (i) **Provide you with our Service:** Including but not limited to provide a dashboard to track your exercise and activity; to enable the features of the App; and to ensure accuracy when you use the App;
- (ii) **Improve our Service:** Including but not limited to troubleshoot and protect against errors; perform data analysis and testing; conduct research and surveys; and develop new features and Services;
- (iii) **Communicate with you:** Including but not limited to send you Service notifications; and respond to you when you contact us;
- (iv) **Protect our Services:** Including but not limited to authenticate users; to prevent and stop potential cyber security threats to our internal systems; to protect your account from unauthorised access, fraud, misuse or damage to our Services; and to investigate suspicious account activity when you use the App.

2.2 The Group will only process Sensitive Personal Data where:

- (i) Explicit consent to the processing of your Sensitive Personal Data for specific purposes is given; or
- (ii) Such processing is legally required by, or necessary for the Group or for you to exercise your rights and/or rights pursuant to other applicable law; or
- (iii) Such processing is necessary for the establishment or exercise of legal proceedings, defense of legal claims, obtaining legal advice, exercise legal rights or whenever a regulatory body, agency, or judicial authority requires this in its official capacity.

3. Disclosure of Personal Data

3.1 We may transfer your Personal Data to companies within the Group, for any of the purposes stated under **paragraph 2.1** above.

3.2 The Group may disclose your Personal Data to third party service providers for any of the purposes stated under **paragraph 2.1** above, including but not limited to information technology support (e.g., software maintenance and data hosting) and fulfilment partners (e.g., fitness trainers and mental health consultants).

3.3 The Group may also share Personal Data with external advisors (e.g., lawyers, accountants and auditors) and/or any other third party with respect to potential acquisition and/or sale of any of the business or assets or other business combination.

3.4 The Group shall not disclose your Personal Data to entities outside the Group for direct marketing purposes. The Group does not use your account information (i.e., name or email address) to offer promotions unrelated to your App usage without your express consent.

3.5 The Group will:

- (i) Exercise appropriate due diligence in the selection of such third-party service providers, advisors, and any third-party purchasers; and
- (ii) Require via appropriate contracts that such third-party service providers, advisors, and any third-party providers maintain adequate security measures to safeguard Personal Data, and process Personal Data only for the specific purpose as provided for under **paragraph 2.1** above.

3.6 The Group may also disclose Personal Data to governmental agencies and regulators (e.g., Malaysian Communications and Multimedia Commission, Malaysian Anti-Corruption Commission, police, and tax authorities), courts and other tribunals and government authorities, or to the extent required by applicable legal obligations.

4. Security and Confidentiality

- 4.1 The Group takes appropriate technical, physical, and organisational measures to protect your Personal Data against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction.
- 4.2 To safeguard against unauthorised access to your Personal Data by third party outside the Group, all electronic Personal Data held by the Group are maintained on systems that are protected by secure network architectures that contain firewalls and intrusion detection devices. The servers holding your Personal Data are “backed up” (i.e., data are recorded on separate media) on a regular basis to avoid the consequences of any inadvertent erasure or destruction of data. The servers are stored in facilities with comprehensive security, fire detection and response systems.
- 4.3 The Group limits access to the internal system that holds your Personal Data to a select group of authorised users who are given access to such system through the use of a unique identifier and password.

5. Retention of Personal Data

- 5.1 The Group will maintain Personal Data for as long as the Group is required to do so by applicable law(s), or for as long as necessary for the purpose(s) under **paragraph 2.1** above. The Group will delete Personal Data when it is no longer needed in accordance with applicable law(s).

6. Cross-Border Transfers of Personal Data

- 6.1 The Group may from time to time transfer Personal Data to third party service providers for the purposes as described under **paragraph 2.1** above, whether within or outside the jurisdiction where the Group is located. They may be located in a jurisdiction that may not provide a level of protection equivalent to that provided by the laws of Malaysia.
- 6.2 Where such transfers occur, the Group shall ensure that the third party service providers to whom Personal Data is transferred shall provide a comparable level of protection as we provide with respect to the Personal Data we collect and process.

7. Individual’s Rights in Relation to Personal Data

- 7.1 Where you have given your consent to the processing of your Personal Data, you may withdraw this consent at any time by writing to us. Withdrawal of your consent will not affect the lawfulness of any processing of your Personal Data that took place before you withdrew your consent. Withdrawal of consent may however impact on your ability to continue with our Service.
- 7.2 You are entitled to obtain access to or to request the rectification or deletion of Personal Data that the Group holds about you.
- 7.3 You may also object, on grounds relating to your particular situation, to the collection and processing of your Personal Data, and, in certain circumstances, you may request that the Group restricts the processing of your Personal Data.
- 7.4 If you would like to request access to, modification or deletion of, ask any questions about, object to, or request a restriction of the processing of your Personal Data, or discuss a transfer of your Personal Data, please contact us at the contact details provided below.
- 7.5 In relation to **paragraph 3.4** above, you may also require the Group to cease or not begin processing your Personal Data for the purposes of direct marketing.
- 7.6 Should you wish to make a complaint in relation to the Group's processing of your Personal Data, you may also contact us, in which case we will make every reasonable effort to assist you with your concerns.

8. Changes to this Privacy Notice

The Group reserve the right to update and amend this Privacy Notice from time to time. We will notify you of any amendments to this Privacy Notice via e-mail.

9. Language

In accordance with the requirement of local data protection and privacy law, this Privacy Notice is issued in both English and Bahasa Malaysia. In the event of any inconsistencies or discrepancies between the English version and the Bahasa Malaysia version, the English version shall prevail.

10. Contact Us

Any questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to:

Head of Privacy/ Data Protection Officer,
Email Address: privacy@celcomdigi.com